



Bernstein-Burkley, P.C.
Keri P. Ebeck, Esquire
Bar No. 262092017
707 Grant Street, Suite 2200, Gulf Tower
Pittsburgh, PA 15219
(412) 456-8112

Order Filed on March 23, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

ATTORNEY FOR CREDITOR: CONSUMER PORTFOLIO SERVICES, INC.


**IN THE BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY (CAMDEN)
HONORABLE ANDREW B. ALTENBURG, JR.**

In re:	:	Case No. 19-29304-ABA
	:	
	:	
GREGORY KEMP AND,	:	
VALERIE JAMES-KEMP,	:	
Debtors,	:	
	:	Chapter 13
	:	
	:	Hearing Date: March 3, 2020
	:	

**CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM STAY DATED
JANUARY 30, 2020 MODIFYING STAY AS TO MOTOR VEHICLE 2015 FORD
ESCAPE UTILITY 4D SE ECOBOOST 4WD, VIN# 1FMCU9GX1FUA11773**

The relief set forth on the following pages, number one (1) through four (6) is hereby
ORDERED.

DATED: March 23, 2020



Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

Debtors: Gregory Kemp and Valerie James-Kemp
Case No.: 19-29304-ABA
Caption of Order: Consent Order Modifying Stay as to Personal Property

1. The 11 U.S.C. §362(a) Stay as to Consumer Portfolio Services, Inc., (“Movant”), with respect to the personal property of Debtors described as a 2011 Ford Escape Utility 4D XLT 3.0L V6, VIN #1FMCU0DG0BKB53313, in accordance with the agreement of the Debtors and Movant is hereby modified and shall remain in effect PROVIDED THAT Debtors comply with the following terms and conditions:

Debtors shall cure the post-petition arrears, including the March payment by March 27, 2020 to bring the account current.

Debtors shall then be responsible for timely making all future regular monthly payments to Movant starting with the payment of \$445.35 due on April 27, 2020. Failure to make future monthly payments shall also be cause for default under this Consent Order.

2. The term “payment” as set forth in Paragraph 1, *supra*, does not include a check that is returned due to insufficient funds, account closed or is otherwise not capable of negotiation for any other reason.

3. Debtors will be in default under the Consent Order in the event that Debtors fail to comply with the payment terms and conditions in Paragraph 1, *supra*. If Debtors fail to cure the default within ten (30) days from the date of default, Movant may file a Certification of Default on five (10) days’ notice to Debtors, counsel for Debtors and the Chapter 13 Trustee for an Order lifting the automatic Stay imposed under 11 U.S.C. §362(a) and permitting Movant to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing sale of the motor vehicle without regard to any future conversion of this matter to a different form of bankruptcy.

Debtors: Gregory Kemp and Valerie James-Kemp
Case No.: 19-29304-ABA
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4. The failure of Movant to file a notice of default will not be construed or act as a waiver of any of the rights of Movant under the Consent Order.

5. In the event the Debtors converts to a bankruptcy under any Chapter other than Chapter 13 of the Bankruptcy Code, then Debtors shall pay all pre-petition arrears and post-petition arrears within fifteen (15) days from the date the case is converted from Chapter 13 to any other Chapter.

6. Movant's fees and costs of \$531 are to be paid through the Chapter 13 Plan.

We hereby Consent to the form and entry of the foregoing Order.

<p><u>/s/ Keri P. Ebeck</u> Keri P. Ebeck , Esquire Bernstein-Burkley, P.C. 707 Grant Street, Suite 2200 - Gulf Tower Pittsburgh, PA 15219 (412) 456-8112 Email: kebeck@bernsteinlaw.com</p>	<p><u>/s/</u> Seymour Wasserstrum, Esquire Law Offices of Seymour Wasserstrum 205 West Landis Avenue Vineland, NJ 08360 (856) 696-8300 Email: mylawyer7@aol.com</p>
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Dated: March 23, 2020

Certificate of Notice Page 4 of 4

United States Bankruptcy Court
District of New JerseyIn re:
Gregory Kemp
Valerie James-Kemp
DebtorsCase No. 19-29304-ABA
Chapter 13**CERTIFICATE OF NOTICE**

District/off: 0312-1

User: admin
Form ID: pdf903Page 1 of 1
Total Noticed: 1

Date Rcvd: Mar 23, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on
Mar 25, 2020.

db/jdb +Gregory Kemp, Valerie James-Kemp, 913 Easy Street, Millville, NJ 08332-1587

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Mar 25, 2020

Signature: /s/Joseph Speetjens**CM/ECF NOTICE OF ELECTRONIC FILING**The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email)
system on March 23, 2020 at the address(es) listed below:

Brian C. Nicholas on behalf of Creditor The Bank of New York Mellon FKA The Bank of New York,
as Trustee et al... bnicholas@kmlawgroup.com, bkgroup@kmlawgroup.com

Denise E. Carlon on behalf of Creditor The Bank of New York Mellon FKA The Bank of New York,
as Trustee et al... dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com

Gavin Stewart on behalf of Creditor Specialized Loan Servicing LLC bk@stewartlegalgroup.com

Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com

Keri P. Ebeck on behalf of Creditor Consumer Portfolio Services, Inc. kebeck@bernsteinlaw.com,
jbluemle@bernsteinlaw.com

Rebecca Ann Solarz on behalf of Creditor The Bank of New York Mellon FKA The Bank of New York,
as Trustee et al... rsolarz@kmlawgroup.com

Seymour Wasserstrum on behalf of Joint Debtor Valerie James-Kemp mylawyer7@aol.com,
ecf@seymourlaw.net

Seymour Wasserstrum on behalf of Debtor Gregory Kemp mylawyer7@aol.com, ecf@seymourlaw.net

U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 9